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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

CAROL WILSON FINE ARTS, INC.,

An Oregon corporation,

Civil No.: 3:14-CV-00587-AA

Plaintiff.

V.

ZIFEN QIAN,

an individual,

Defendant.

DECLARATION OF ZIFEN QIAN IN SUPPORT OF MOTION OF DEFENDANT ZIFEN QIAN'S SUMMARY JUDGMENT and CLARIFICATION FOR DEFENDANT'S CLAIM OF MOTION OF **DEFENDANT ZIFEN QIAN'S SUMMARY JUDGMENT**

Zifen Qian declares as follows:

- a. I am Zifen Qian, Defendant of this case. I provide this declaration in support of Motion Of Defendant Zifen Qian's Summary Judgment and Clarification for Defendant's Claim of Motion of Defendant Zifen Qian's Summary Judgment. I have personal knowledge of the matters herein, and if called, could testify competently thereto.
- b. Please read both Motion of Defendant Zifen Qian's Summary Judgment and Clarification for Defendant's Claim of Motion of Defendant Zifen Qian's Summary Judgment.

I declare under penalty of perjury that the foregoing statements are true. This declaration shall be executed on 26th of September, 2014.

By:

Zifen Qian

2811 Beacon Hill Drive

West Linn, OR 97068

Zifen@live.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 26th, 2014, a copy of DECLARATION OF ZIFEN QIAN IN SUPPORT OF MOTION OF DEFENDANT ZIFEN QIAN'S SUMMARY JUDGMENT and CLARIFICATION FOR DEFENDANT'S CLAIM OF MOTION OF DEFENDANT ZIFEN QIAN'S SUMMARY JUDGMENT was served by US Mail and email to:

Stephen J. Joncus, OSB #013072 KLARQUIST SPARKMAN, LLP 121 S. W. Salmon Street, Suite 1600 Portland, OR 97204 Stephen.joncus@klarquist.com. Attorney for Plaintiff

By:

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